

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

YURY REMEDIO

CIVIL ACTION

versus

NO.: 6:21-cv-03527

NOBLE DRILLING (U.S.), LLC  
ET AL

DISTRICT JUDGE  
ROBERT R. SUMMERHAYS

MAGISTRATE JUDGE  
CAROL B. WHITEHURST

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**RESPONSE TO REMOVAL ORDER**

**NOW INTO COURT**, through undersigned counsel, comes Defendant, Noble Drilling (U.S.), LLC (“Noble Drilling”), who, and in connection with its Notice of Removal (Rec. Doc. No. 1) and in response to the Removal Order issued by the Court (Rec. Doc. No. 4), submits this pleading:

(1)(a) A list of all attorneys involved in the case and the parties they represent:

- Lawrence Curtis, counsel for Plaintiff, Yury Remedio
- Robert Kallam, Brad Schlotterer, Sean McLaughlin, and Taylor Ashworth, counsel for Defendants Noble Drilling (US) LLC, Noble Drilling Holding LLC, and Noble Drilling Services LLC f/k/a Noble Drilling Services Inc.
- Thomas Diaz, Alex Baynham, and Vanessa Anseman, counsel for Defendants, Shell Oil Company and Shell Offshore Inc.

(1)(b) Copies or electronic images of all records and proceedings occurring in the State Court prior to removal, arranged by order of filing date

- See attached Exhibit “A.”

(1)(c) A list of all documents included in the State Court record, arranged by order of filing date

- Fax-filed Petition
- State civil cover sheet
- Stamped Petition
- Request for Notice

- Fax receipt/letter
- Stamped petition
- Request for Notice
- State civil cover sheet
- Citation return Noble Drilling Holding LLC
- Citation return Noble Drilling Services Inc.
- Citation return Shell Oil Company
- Citation return Shell Offshore Inc.
- Citation return Noble Drilling (US) LLC
- Citation Noble Drilling (US) LLC
- Citation Noble Drilling Services Inc.
- Citation Noble Drilling Holding LLC
- Citation Shell Oil Company
- Citation Shell Offshore Inc.
- Citation return Noble Drilling (US) LLC
- Secretary of state letter Noble Drilling Holding LLC with attachments
- Secretary of state letter Noble Drilling Services Inc with attachments
- Stamped Petition
- Written discovery
- Letter
- Notice of Filing of Removal with attachments

(1)(d) A certificate by counsel that the above constitutes the entire State Court record

- See attached certificate Exhibit “B.”

(2)(a) No motions or exceptions were pending in State Court at the time of removal.

(2)(b) No registry funds were on file with the State Court.

Respectfully submitted:

**KEAN MILLER LLP**

/s/ Sean T. McLaughlin  
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ATTORNEYS FOR NOBLE DRILLING (U.S.), LLC

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this the 18<sup>th</sup> day of October 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to those who are non-CM/ECF participants.

/s/ Sean T. McLaughlin  
**SEAN T. McLAUGHLIN**